

Joseph R. Saveri (State Bar No. 130064)
JOSEPH SAVERI LAW FIRM, INC.
505 Montgomery Street, Suite 625
San Francisco, California 94111
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com

Benjamin D. Brown (State Bar No. 202545)
COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W.,
Suite 500, East Tower
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408 4699
rkoffman@cohenmilstein.com

Eric L. Cramer (*pro hac vice*)
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
ecramer@bm.net

Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren Uyenoyama

[Additional Counsel Listed on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, and Jon Fitch, on
behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case Nos. 5:14-cv-05484-EJD; 5:14-cv-
05591-EJD; 5:14-cv-05621-EJD; 5:15-cv-
00521-EJD; 5:15-cv-01324-EJD

**STIPULATION EXTENDING BRIEFING
SCHEDULE FOR DEFENDANT'S
MOTION TO STAY DISCOVERY**

Date: September 10, 2015
Time: 9:00 a.m.
Courtroom: 4
Judge: Hon. Edward J. Davila

5:14-cv-05484-EJD, 5:14-cv-05591-EJD
5:14-cv-05621-EJD, 5:15-cv-00521-EJD
5:15-cv-01324-EJD

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Kyle Kingsbury and Darren Uyenoyama, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Vazquez, Dennis Hallman, Brandon Vera,
 2 Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren Uyenoyama (collectively,
 3 “Plaintiffs”) and Defendant Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC
 4 (“Defendant”), pursuant to Civil Local Rule 6-2, request that the Court enter the parties’ stipulation
 5 below extending the time for Plaintiffs to respond to the Defendant’s Motion to Stay Discovery (the
 6 “Stipulation”).

7 **FACTS UNDERLYING THE PARTIES’ STIPULATION**

8 In support of their Stipulation, the parties offer the following facts:

9 A. Between December 16, 2014 and April 2, 2015, Plaintiffs filed five related class actions
 10 against Defendant.

11 B. On January 15, 2015, the parties stipulated that Defendant would respond to Plaintiffs’
 12 Complaints by February 27, 2015.

13 C. On January 30, 2015, Defendant filed a Motion to Transfer Venue to the District of
 14 Nevada. This Motion is fully briefed and was argued and submitted on May 7, 2015.

15 D. On February 27, 2015, Defendant filed a Motion to Dismiss. This Motion is fully
 16 briefed. The hearing on the motion is set for July 23, 2015.

17 E. On May 13, 2015, Defendant filed a Motion to Stay Discovery pending the Court’s
 18 decisions on Defendant’s Motion to Dismiss and its Motion to Transfer Venue.

19 F. Pursuant to Civil Local Rule 7-3(a), Plaintiffs’ Opposition to Defendant’s Motion to
 20 Stay is due on May 27, 2015.

21 G. The parties agree that party and judicial efficiency would be best served by permitting
 22 Plaintiffs to have an extension to file their Opposition to Defendant’s Motion to Stay Discovery and a
 23 concomitant extension for the Defendant to file its Reply brief.

24 H. No previous extension has been sought as to this motion. This extension does not affect
 25 the noticed hearing date or any other proceeding on the Court’s calendar.

26 **STIPULATION**

27 In light of the above facts, the parties jointly request that the Court enter the following
 28 Stipulation as the Order of the Court.

1 1. Plaintiffs shall file their Opposition to Defendant's Motion to Stay Discovery on or
2 before June 3, 2015. The brief shall not exceed 25 pages.

3 2. Defendant shall file its Reply on or before June 17, 2015. The brief shall not exceed 15
4 pages.

5 3. Nothing in this Stipulation precludes Plaintiffs or Defendant from seeking to amend the
6 filing deadlines set forth herein as permitted under the Local Rules if circumstances warrant.

7 IT IS SO STIPULATED.

8 DATED: May 22, 2015

9 JOSEPH SAVERI LAW FIRM, INC.

10 By: /s/ Joseph R. Saveri
11 Joseph R. Saveri

12 Joseph R. Saveri (State Bar No. 130064)
13 Joshua P. Davis (State Bar No. 193254)
14 Andrew M. Purdy (State Bar No. 261912)
15 Matthew S. Weiler (State Bar No. 236052)
16 Kevin E. Rayhill (State Bar No. 267496)
17 JOSEPH SAVERI LAW FIRM, INC.
18 505 Montgomery Street, Suite 625
19 San Francisco, California 94111
20 Telephone: (415) 500-6800
21 Facsimile: (415) 395-9940
22 jsaveri@saverilawfirm.com
23 jdavis@saverilawfirm.com
24 apurdy@saverilawfirm.com
25 mweiler@saverilawfirm.com
26 krayhill@saverilawfirm.com

27 Benjamin D. Brown (State Bar No. 202545)
28 Richard A. Koffman (*pro hac vice*)
 Hiba Hafiz (*pro hac vice* pending)
29 COHEN MILSTEIN SELLERS & TOLL, PLLC
30 1100 New York Ave., N.W., Suite 500, East Tower
31 Washington, DC 20005
32 Telephone: (202) 408-4600
33 Facsimile: (202) 408 4699
34 bbrown@cohenmilstein.com
35 rkoffman@cohenmilstein.com
36 hhafiz@cohenmilstein.com

Eric L. Cramer (*pro hac vice*)
 Michael Dell'Angelo (*pro hac vice*)
 Patrick Madden (*pro hac vice*)
 BERGER & MONTAGUE, P.C.
 1622 Locust Street
 Philadelphia, PA 19103
 Telephone: (215) 875-3000
 Facsimile: (215) 875-4604
 ecramer@bm.net
 mdellangelo@bm.net
 pmadden@bm.net

Robert C. Maysey (State Bar No. 205769)
 Jerome K. Elwell (*pro hac vice*)
 WARNER ANGLE HALLAM JACKSON &
 FORMANEK PLC
 2555 E. Camelback Road, Suite 800
 Phoenix, AZ 85016
 Telephone: (602) 264-7101
 Facsimile: (602) 234-0419
 rmaysey@warnerangle.com
 jelwell@warnerangle.com

Eugene A. Spector (*pro hac vice* pending)
 Jeffrey J. Corrigan (*pro hac vice* pending)
 Jay S. Cohen (*pro hac vice* pending)
 William G. Caldes (*pro hac vice* pending)
 SPECTOR ROSEMAN KODROFF & WILLIS, P.C.
 1818 Market Street – Suite 2500
 Philadelphia, PA 19103
 Telephone: (215) 496-0300
 Facsimile: (215) 496-6611
 espector@srkw-law.com
 jcorrigan@srkw-law.com
 jcohen@srkw-law.com
 wcaldes@srkw-law.com

1 Frederick S. Schwartz (State Bar No. 145351)
2 LAW OFFICE OF FREDERICK S. SCHWARTZ
3 15303 Ventura Boulevard, #1040
4 Sherman Oaks, CA 91403
5 Telephone: (818) 986-2407
6 Facsimile: (818) 995-4124
7 fred@fredschwartzlaw.com

8 *Attorneys for Individual and Representative*
9 *Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis*
10 *Javier Vazquez, Dennis Lloyd Hallman, Brandon*
11 *Vera, Pablo Garza, Gabe Ruediger, Mac Danzig,*
12 *Kyle Kingsbury, and Darren Uyenoyama*

13 BOIES, SCHILLER & FLEXNER LLP

14 By: /s/ William A. Isaacson
15 William A. Isaacson

16 William A. Isaacson (*Pro Hac Vice*)
17 5301 Wisconsin Ave, NW
18 Washington, DC 20015
19 Telephone: (202) 237-2727;
20 Facsimile: (202) 237-6131
21 wisaacson@bsflp.com

22 John F. Cove, Jr. (State Bar No. 212213)
23 BOIES, SCHILLER & FLEXNER LLP
24 1999 Harrison Street, Suite 900
25 Oakland, CA 94612
26 Telephone: (510) 874-1000;
27 Facsimile: (510) 874-1460
28 jcove@bsflp.com

Richard J. Pocker (State Bar No. 114441)
BOIES, SCHILLER & FLEXNER LLP
300 South Fourth Street, Suite 800
Las Vegas, NV 89101
Telephone: (702) 382 7300;
Facsimile: (702) 382 2755
rpocker@bsflp.com

1 Donald J. Campbell (*Pro Hac Vice* to be filed)
2 J. Colby Williams (*Pro Hac Vice* to be filed)
3 CAMPBELL & WILLIAMS
4 700 South 7th Street
5 Las Vegas, Nevada 89101
6 Telephone: (702) 382-5222;
7 Facsimile: (702) 382-0540
8 DJC@campbellandwilliams.com
9 JCW@campbellandwilliams.com

10 *Attorneys for Defendant Zuffa, LLC, d/b/a Ultimate*
11 *Fighting Championship and UFC*

12 Pursuant to Local Rule 5.1(i)(3), I attest that all of the above signatories listed, and on whose behalf the
13 filing is submitted, concur in the filing's content and have authorized the filing.

14 Dated: May 22, 2015

15 By: /s/ Joseph R. Saveri
16 Joseph R. Saveri

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

By: _____

Honorable Edward J. Davila
United States District Judge